

LAWRENCE A. ORGAN, Cal. Bar No. 175503  
larry@civilrightsca.com  
NAVRUZ AVLONI, Cal. Bar. No. 279556  
navruz@civilrightsca.com  
CALIFORNIA CIVIL RIGHTS LAW GROUP  
332 San Anselmo Avenue  
San Anselmo, California 94960  
Telephone: (415)-453-7352  
Facsimile: (415)-785-7352

Attorneys for Plaintiffs,  
DEMETRIC DI-AZ and OWEN DIAZ

JASON A. GELLER, Cal. Bar. No. 168149  
JUAN C. ARANEDA, Cal. Bar. No. 213041  
VINCE ADAMS, Cal. Bar No. 284975  
FISHER & PHILLIPS LLP  
One Embarcadero Center, Suite 2050  
San Francisco, CA 94111  
Telephone: (415)-490-9000  
Facsimile: (415)-490-9001

Attorneys for Defendant,  
NEXTSOURCE, INC.

**STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

DEMETRIC DI-AZ, OWEN DIAZ AND  
LAMAR PATTERSON

Plaintiffs,

v.

TESLA, INC. DBA TESLA MOTORS,  
INC., CITISTAFF SOLUTIONS, INC.;  
WEST VALLEY STAFFING GROUP;  
CHARTWELL STAFFING SERVICES,  
INC.; NEXTSOURCE, INC.; and  
DOES 1-10, inclusive

Defendants.

Case No. 17-cv-06748-WHO

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEADLINE TO FILE  
DISCOVERY DISPUTE LETTER**

FAC Filed:  
Trial Date:

December 26, 2018  
March 2, 2020

1 Pursuant to Northern District of California Civil Local Rules 6-2 and 7-12, Plaintiffs  
2 DEMETRIC DI-AZ and OWEN DIAZ (“Plaintiffs”) and Defendant NEXTSOURCE, INC.  
3 (“nextSource”), by and through their respective counsel, hereby stipulate and agree as follows:

4 WHEREAS, Plaintiff filed the First Amended Complaint on December 26, 2018. (Dkt. No.  
5 57). nextSource answered the First Amended Complaint on February 8, 2019. (Dkt. No. 74).

6 WHEREAS, the Court’s July 17, 2019 Civil Pretrial Order set the fact discovery cutoff for  
7 October 11, 2019. (Dkt. No. 78.)

8 WHEREAS, Civil Local Rule 37-3 provides that parties must file all motions to compel  
9 discovery no more than 7 days after the fact discovery cut-off date.

10 WHEREAS, pursuant to Civil Local Rule 37-3 and the Civil Pretrial Order, all discovery  
11 disputes must be raised with the Court no later than October 18, 2019.

12 WHEREAS, Plaintiffs initiated the meet and confer process regarding nextSource’s  
13 objections to Plaintiffs’ First Amended Notice of Videotaped Deposition of nextSource, Inc.’s  
14 Person Most Knowledgeable Pursuant to Fed. R. Civ. P. 30(B)(6); and Request for Production of  
15 Documents on September 6, 2019 (the “PMK Deposition Notice”).

16 WHEREAS, Plaintiffs and nextSource met and conferred in person in an attempt to resolve  
17 their dispute on September 13, 2019.

18 WHEREAS, Plaintiffs and nextSource are continuing the meet and confer process, and  
19 seeking to come to a compromise without enlisting the Court’s assistance.

20 WHEREAS, Plaintiffs and nextSource believe that they can reduce or eliminate the need to  
21 enlist the Court’s assistance in resolving their dispute if they have additional time to meet and confer  
22 regarding nextSource’s objections to the PMK Deposition Notice.

23 WHEREAS, Plaintiffs and nextSource agree to extend Plaintiffs’ deadline to raise their  
24 dispute regarding nextSource’s objections to the PMK Deposition Notice to October 23, 2019, to  
25 allow the parties additional time to negotiate an informal resolution of their dispute.

26

27 NOW THEREFORE, Plaintiffs and nextSource hereby agree and stipulate as follows:

28 1. Plaintiffs’ deadline to raise a dispute with the Court with respect to nextSource’s objections

1 to Plaintiffs' First Amended Notice of Videotaped Deposition of nextSource, Inc.'s Person  
2 Most Knowledgeable Pursuant to Fed. R. Civ. P. 30(B)(6); and Request for Production of  
3 Documents is extended to October 23, 2019.

4  
5 **IT IS SO STIPULATED.**  
6

7  
8 Dated: October 18, 2019

CALIFORNIA CIVIL RIGHTS LAW GROUP

9  
10 By /s Navruz Avloni  
11 Lawrence A. Organ  
12 Navruz Avloni  
13 Attorneys for Plaintiffs  
14 DEMETRIC DI-AZ and OWEN DIAZ

15 Dated: October 18, 2019

FISHER PHILLIPS LLP

16  
17 By /s Vince Adams  
18 Juan Araneda  
19 Vince Adams  
20 Jason Geller  
21 Attorneys for Defendant  
22 nextSource, Inc.

23 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**  
24

25 DATED: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE WILLIAM H. ORRICK